

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**LANCIUM LLC,**

**Plaintiff,**

**v.**

**LAYER1 TECHNOLOGIES, INC.,**

**Defendant.**

**Civil Action No. 6:20-cv-00739**

**Jury Trial Demanded**

**STIPULATION TO DISMISS WITH PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Lancium LLC (“Lancium”) and Defendant Layer1 Technologies, Inc. (“Layer1”) hereby stipulate to dismissal of this action WITH PREJUDICE pursuant to the terms of a Settlement Agreement. The parties further stipulate that each party shall bear their own costs, expenses, and attorneys’ fees.

The Parties agree that the Court retains jurisdiction for the purpose of enforcing the terms of the Settlement Agreement and the United States District Court for the Western District of Texas is an agreed venue for any future claims relating thereto.

Dated: March 5, 2021

Respectfully submitted,

**BARNES & THORNBURG LLP**

By: s/ Mark C. Nelson

Mark C. Nelson  
Texas Bar No. 00794361  
Daniel A. Valenzuela  
Texas Bar No. 24067918  
BARNES & THORNBURG LLP  
2121 N. Pearl Street, Suite 700  
Dallas, TX 75201  
Email: mnelson@btlaw.com  
Email: dvalenzuela@btlaw.com  
Telephone: 214-258-4200  
Fax: 214-258-4199

*Attorneys for Plaintiff  
Lancium LLC*

s/ Michael J. Sacksteder

Michael J. Sacksteder, CA Bar No. 191605  
(Admitted W.D. Tex.)  
Email: msacksteder@fenwick.com

**FENWICK & WEST LLP**  
555 California Street  
San Francisco, CA 94104  
Telephone: 415.875.2300  
Facsimile: 415.281.1350  
*Counsel for Defendant*

LAYER1 TECHNOLOGIES, INC.

**CERTIFICATE OF SERVICE**

The foregoing document was filed on March 5, 2021 through the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties who have appeared in this action on the date of such service.

/s/ Mark C. Nelson  
Mark C. Nelson